

EXHIBIT 1A  
 UNITED STATES DISTRICT COURT  
 DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 0410080GAO

\*\*\*\*\*

RALPH J. VOLLMANN,  
 Plaintiff

vs.

ROGER LYNN GRUBB and  
 ALLIED SYSTEMS LTD.,  
 Defendants

\*\*\*\*\*

**Definition: The truck:** The truck and trailer operated by Roger Lynn Grubb at the time of the accident alleged in the complaint.

**PLAINTIFF'S INTERROGATORIES TO DEFENDANT, ALLIED SYSTEMS LTD.**

1. Please identify yourself by stating your name, residential and business address, occupation, employer, date of birth, and position with the defendant.
2. State the full legal name and address of:
  - a. The owner of the truck operated by defendant, Grubb, at the time of the accident alleged in the complaint;
  - b. Any successor corporation to the entity named in 2(a);
  - c. Defendant, Grubb's employer at the time of the accident alleged in the complaint.
3. Describe the nature of the legal relationship between the defendant, Allied Systems Ltd., and:
  - a. the entity or person named in 2(a);
  - b. the entity named in 2(c).
4. Please describe fully and in detail, to the best of your knowledge and belief, how the alleged accident occurred in the order in which said events took place.
5. Please state from where the defendant was coming and where defendant was going at the time of the accident described in the complaint, specifying the addresses.
6. At the time of the accident alleged in the complaint, was defendant, Grubb, operating the vehicle with the permission of defendant, Allied Systems Ltd., or the entity(ies) named in Answer 2(a) - (c)?

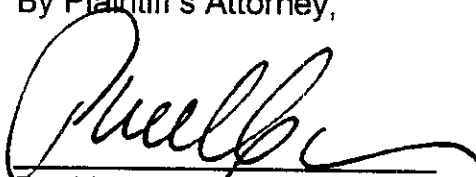
7. If your answer to the above interrogatory is in the affirmative, please state the purpose for which defendant, or the entity(ies) named in Answer 2(a) - (c) permitted defendant, Grubb, to use the vehicle.
8. Was the defendant, Grubb, using the truck during the course of his employment with defendant, Allied Systems Ltd., or the entity(ies) named in Answer 2(b) - (c) at the time of the accident?
9. If you know of any witness relevant to the accident described in the complaint, please state the full name and address, including street and number and city or town.
10. Was there liability insurance policy in force and effect on the motor vehicle operated by you at the time of the accident described in the complaint.
11. If your answer to preceding interrogatory is in the affirmative, please state:
  - a. the name of the insurance company or companies which was/were holding said insurance policy/policies;
  - b. the liability indemnification limits provided by the said insurance policy/policies at the time of the accident described in the complaint.
12. If the defendant expects to call an expert witness at the trial of the action please state:
  - a. the name and address of each such expert witness;
  - b. the subject matter in detail on which each such expert may be expected to testify;
  - c. the substance in detail of all facts and opinions about which each expert may be expected to testify at the trial of this action.
13. Please state the names and addresses of any and all persons defendant intends to call as fact witnesses at trial, with a brief description on the subject matter of their expected testimony.
14. If you contend that the Plaintiff acted in such manner as to cause or contribute to the occurrence, state all facts upon which you rely.
15. If any person inspected the truck following the accident in order to assess if any problem with the truck contributed to the accident, please state:
  - a) the name, address and employer of the person who inspected;
  - b) the date(s) of inspection;
  - c) any findings or conclusions made by the individual(s) who inspected.

16. With respect to the truck, give its complete configuration (including at least the following information):

- a) make and model;
- b) empty weight of the truck;
- c) weight of the load at the time of the collision;
- d) length, width and height of the truck;
- e) licenses held for the truck;
- f) make, model and horsepower of the engine;
- g) make and model of the transmission;
- h) make, model and types of the brakes;
- i) makes, models and mileage on the tires;
- j) all changes from the original configuration (and an explanation as to why each was changed);
- k) name and street and mailing addresses of the individual or company the truck was purchased from.

By Plaintiff's Attorney,

Dated: 3/4/04



Paul Nathan, Esquire  
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I hereby certify that a true original  
of the above document was served upon  
the attorney of record for each party via  
first-class mail on 3/4/04

